

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
LESTER L. SPEESE, :  
Debtor : Bky No. 24-12357-amc

**ANSWER OF CREDITORS, GLENN AND LINDA DRACOPOULOS, TO DEBTOR'S  
MOTION TO EXTEND TIME FOR THE DEBTOR TO FILE HIS SCHEDULES AND  
STATEMENT OF FINANCIAL AFFAIRS PURSUANT TO BANKRUPTCY RULE 1007(c)**

Creditors, Glenn and Linda Dracopoulos, by and through their undersigned counsel, Jeffrey C. McCullough, Esquire, respond to Motion of Debtor to extend time for the Debtor to file his schedules and statement of financial affairs as follows:

1. Admitted that Debtor filed in the above-captioned bankruptcy case on July 9, 2024. Denied that there were any “emergency” circumstances to the filing of that petition.
2. Admitted that the remaining schedules are due to be filed by July 23, 2024 by Order of Court.
3. Admitted that Bankruptcy Rule 1007(c) authorizes the Court to provide further extension of the filing deadline for “cause” shown. Denied that Debtor’s Motion sets forth any “cause”.
4. Debtor’s failure to provide his counsel with required information to properly complete the required schedules and statements is not “cause” for further extension of the filing deadline.
5. Due to the absence of “cause”, Debtor’s request for additional time to submit the remaining documents should be denied.

WHEREFORE, Creditors, Glenn and Linda Dracopoulos, request that this Court deny Debtor’s Motion to Extend Time for the Debtor To File His Schedules and Statement of Financial Affairs Pursuant to Bankruptcy Rule 1007(c).

Date: 7/18/2024

Respectfully submitted,

/s/Jeffrey C. McCullough  
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